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 INTERNATIONAL ORGANIZATION OF MASTERS,
 MATES, AND PILOTS, PACIFIC MARITIME REGION

UNITED STATES DISTRICT COURT
FOR THE NORTHERN DISTRICT OF CALIFORNIA

| | | |
|--------------------------------|---|-----------------------------------|
| INTERNATIONAL ORGANIZATION OF |) | Case No. C-06-2107-CW |
| MASTERS, MATES, AND PILOTS, |) | |
| PACIFIC MARITIME REGION, |) | STIPULATION AND ORDER |
| |) | EXTENDING DEADLINE AND |
| Plaintiff, |) | SETTING BREIFING SCHEDULE |
| |) | FOR MOTION FOR ATTORNEYS |
| v. |) | FEES AND COSTS AS MODIFIED |
| |) | |
| NATIONAL PARK SERVICE, et al., |) | |
| |) | |
| Defendants. |) | |
| |) | |

Plaintiff International Organization of Masters, Mates and Pilots, Pacific Maritime
 Region (“MM&P”) and Defendants National Park Service and its Director (“Defendants”), by
 through their respective counsel, stipulate and agree as follows:

WHEREAS, MM&P intends to seek attorneys fees and costs from Defendants in this
 action in view of the stipulated judgment entered by the Court on June 19, 2009;

1 WHEREAS, under the Local Rules of this Court, Plaintiff's motion for attorneys fees and
2 costs must be filed no later than July 3, 2009;

3 WHEREAS, the parties are meeting and conferring in an effort to resolve the attorneys
4 fee dispute without a motion, but the parties require additional time to try to reach an agreement;

5 NOW THEREFORE, the parties stipulate and agree that MM&P shall have until July 17,
6 2009 to move for attorneys' fees and costs; Defendants shall have until July 27, 2009 to file a
7 response, and Plaintiff shall have until August 7, 2009 to file a reply.

8 Respectfully submitted,

9 DATED: June 24, 2009

10 LEONARD CARDER, LLP
11 ROBERT S. REMAR
12 ELEANOR MORTON

13 By: /s/ Eleanor Morton
14 Eleanor Morton
15 Attorneys for Plaintiff MM&P


16 DATED: June 24, 2009

17 JOSEPH R. RUSSONIELLO
18 United States Attorney

19 /s/ Stephen Johnston
20 STEPHEN JOHNSTON
21 Assistant United States Attorney
22 Attorneys for Federal Defendants

23 PURSUANT TO STIPULATION, IT IS SO ORDERED. **THE MOTION WILL BE**
24 **DECIDED ON THE PAPERS.**

25 6/30/09

26 
27 HON. CLAUDIA WILKEN
28 United States District Judge